

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS AT BOSTON

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HEATHER KIERNAN,

Plaintiff,

-v-

CIVIL NO. 04-10131 RBC

ARMORED MOTOR SERVICE OF  
AMERICA, INC., and  
FRANCESCO CIAMBRIELLO

Defendants.

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**JOINT MOTION TO PERMIT THE FILING OF  
A SUPPLEMENTAL LIST OF EXHIBITS & WITNESSES**

The Plaintiff Heather Kiernan and the Defendant Armored Motor Services of America, Inc. (AMSA) jointly move for an order permitting the filing of a supplemental list of exhibits and witnesses, and establishing a deadline for the parties to serve and file their objections.

As grounds in support, the undersigned parties respectfully represent:

1. The Court's Order of November 14, 2006 (the "Order") requires the parties to file their pretrial memorandum by March 28, 2007. The parties below have complied with the order.
2. The Order requires that "any party who intends to object to any proposed exhibit shall give notice of the ground of objection to the party offering the exhibit and file a copy of the notice with the Clerk by Wednesday, April 11, 2007." The parties below will comply with

the order to the extent that they will be serving their objections to documents identified in the pretrial memorandum.

3. On Friday, April 6, 2007, the undersigned met and discussed the need to supplement their witness list as well as their disclosed exhibits. Neither party has any objection to the other supplementing that list.
4. The parties agree:
  - a. Supplemental exhibit disclosures will be made by April 20, 2007;
  - b. Written objections to exhibit disclosures must be served and filed by the close of business on Wednesday, April 25, 2007;
  - c. Supplemental witness disclosures must be made by April 20, 2007;
  - d. Motions in Limine pertaining to these disclosures must be filed by the close of business on Wednesday, April 25, 2007.

WHEREFORE, the parties respectfully request that this motion be ALLOWED.

Respectfully submitted:

HEATHER KIERNAN, Plaintiff

ARMORED MOTOR SERVICES  
OF AMERICA, INC., Defendant

/s/ William J. McLeod  
William J. McLeod, BBO 560572  
McLEOD LAW OFFICES, PC  
LLP77 Franklin Street  
Boston, MA 02110  
617.542.2956/phone  
wjm@mcleodlawoffices.com

/s/ Allison K. Romantz  
Allison K. Romantz BBO 554909  
MORGAN, BROWN & JOY  
200 State Street  
Boston, MA 02109  
617.523.6666  
aromantz@morganbrown.com

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